

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

(1) PHILIP SANDERS, an Individual)
and Husband and Next of Kin of)
BRENDA JEAN SANDERS, deceased,)
)
Plaintiff,)

vs.)

Case No.: 17-CV-492-JED-CDL

(1) CREEK COUNTY BOARD OF)
COUNTY COMMISSIONERS, and)
(2) SHERIFF BRET BOWLING, in)
his official capacity as Creek County)
Sheriff, and (3) TURN KEY HEALTH)
CLINICS, a limited liability company,)
)
Defendants.)

**DEFENDANT TURN KEY HEALTH CLINICS, LLC'S UNOPPOSED
MOTION TO FILE BRIEF IN EXCESS OF THE TWENTY-FIVE (25) PAGE LIMIT**

COMES NOW, Defendant Turn Key Health Clinics, LLC, ("Turn Key" or "Defendant"), and, pursuant to LCvR7.2 of the Local Rules of the Court for the Northern District of Oklahoma, respectfully moves this Court for leave to file its Motion for Summary Judgment and brief in support in excess of twenty-five (25) pages. In support thereof, Turn Key states the following:

1. Currently, dispositive motions in this matter are due by June 9, 2021¹. *See* Doc. 152, *Scheduling Order*.

2. LCvR7.2(c) states that "[n]o brief shall be submitted that is longer than twenty-five (25) typewritten pages without leave of Court. Motions for leave to file a brief in excess of twenty-five (25) typewritten pages shall state the requested number of pages and shall be filed no later than 1 day prior to the date the brief is due." LCvR7.2(c).

¹ The dispositive motion deadline is the subject of a pending Motion which seeks to continue it to a later date. *See* Doc. Nos. 165, 166.

3. Pursuant to LCvR7.2(c), Turn Key respectfully requests leave to file its Motion for Summary Judgment in excess of the twenty-five (25) page limit.

4. Turn Key anticipates its Motion for Summary Judgment will be at or about thirty (30) pages in length.

5. As such, Turn Key respectfully requests leave to file its thirty (30) page Motion for Summary Judgment.

6. Turn Key recognizes that it is seeking to file a brief that is in excess of the requirements of the Local Court Rules for the United States Northern District of Oklahoma. Turn Key has tried to be concise in its arguments as much as possible and believes that the number of pages requested are necessary for it to completely address the claims being asserted against it by Plaintiff.

7. Defendant has put forth a good faith effort to comply with the local rule regarding page limitation in drafting its Motion for Summary Judgment. However, due to Plaintiff's claims, the corresponding case law and analysis of the same, Turn Key does need additional pages to adequately address and completely brief its positions and arguments in its forthcoming Motion for Summary Judgment.

8. Counsel for Defendant has conferred with Counsel for Plaintiff, who has no objection to the relief sought herein.

WHEREFORE, premises considered, Defendant Turn Key Health Clinics, LLC, respectfully requests this Court to grant it leave to file its thirty (30) page Motion for Summary Judgment pursuant to LCvR7.2(c).

[Continued on next page]

Respectfully submitted,

/s/ Sean P. Snider

SEAN P. SNIDER, OBA # 22307

AUSTIN J. YOUNG, OBA # 32684

JOHNSON HANAN AND VOSLER

9801 N. Broadway Extension

Oklahoma City, OK 73114

Telephone: (405) 232-6100

Facsimile: (405) 232-6105

E-Mail: ssnider@johnsonhanan.com

E-Mail: ayoung@johnsonhanan.com

*Attorneys for Defendants Turn Key Health
Clinics, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on **June 7, 2021**, a true and correct copy of the above and foregoing was electronically transmitted to the Clerk of this Court using the ECF System for filing and transmittal of a Notice of Electronic Filing and to all ECF registrants who have appeared in this case.

/s/ Sean P. Snider

Sean P. Snider